



UNITED STATE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)

)

No. 3:22-CR-00327-2

v.)

)

JUDGE TRAUGER

HEATHER IDONI)

)

**AMENDED MOTION REQUESTING LEAVE OF COURT TO FILE SEALED
DOCUMENT**

Comes now, the defendant, Heather Idoni, by and through undersigned counsel, pursuant to Title 18 U.S.C. § 3006A which provides for an *ex parte* application, and hereby requests leave of this Honorable Court to file a sealed motion for this Court's review. Counsel for Ms. Idoni submits that the motion is properly filed under seal and that the law specifically provides that the sealed motion be filed *ex parte*. Counsel further represents to this Court that he **will not serve** a copy of the *under seal* document on the government or codefendants.

Respectfully Submitted,

/s/ William J. Conway

WILLIAM J. CONWAY, No. 026808

214 Second Ave. N., Ste. 208

Nashville, TN 37201

(615) 263-5363

wjconway@gmail.com